

# Greenberg Traurig

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## VIA HAND DELIVERY

The Honorable Stuart M. Bernstein  
Chief Bankruptcy Judge  
United States Bankruptcy Court  
One Bowling Green  
New York, New York 10004

Re: In re Quigley Company, Inc., Case No. 04-15739 (SMB)

Dear Judge Bernstein:

We represent Pfizer Inc. ("Pfizer") in this chapter 11 case. We are writing in response to the request made by Allianz Global Risk U.S. Insurance Company (f/k/a Allianz Insurance Company) and Allianz Underwriters Insurance Company (f/k/a Allianz Underwriters Inc.) (collectively, "Allianz") for the Court's intervention in Allianz's document production request (ECF Docket # 1956) (the "Document Request"). Pfizer opposes the Document Request, and hereby joins in the statements made by Quigley Company Inc. ("Quigley") in its letter to the Court dated October 12, 2009 (ECF Docket # 1959) (the "Quigley Letter").

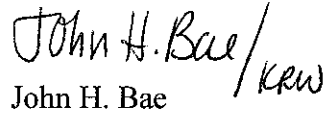
Allianz is a non-settled insurer that has coverage disputes with Pfizer and Quigley. Given that the documents listed in the Document Request have not been used as trial exhibits, the only apparent reason for the Document Request is to obtain information relating to the parties' insurance coverage disputes. As outlined in the Quigley Letter, the Document Request directly violates both the corrected stipulation and order concerning insurance issues approved by this Court on July 21, 2009 (ECF Docket # 1873) (the "Insurance Neutrality Stipulation") and the stipulation governing the production of confidential material entered on August 17, 2009 (Adv. Proc. No. 04-04262 (SMB), ECF Docket # 279) (the "Confidentiality Stipulation").

The Confidentiality Stipulation limits a party's use of confidential materials to purposes of Quigley's bankruptcy case. The Insurance Neutrality Stipulation bars Allianz from pursuing discovery or otherwise "participat[ing] in the Bankruptcy Case." Accordingly, there can be no legitimate purpose underlying Allianz's Document Request, and Pfizer respectfully requests that the Court deny Allianz's request for *ex parte* judicial intervention.

NY 239,835,292v2 10-12-09

We are available to answer any questions the Court may have.

Respectfully submitted,

  
John H. Bae

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